

EXHIBIT 1

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Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

| | | |
|---------------------------------|---|---------------------------------|
| MARK SNOOKAL, an individual, |) | CASE NO.: 2:23-cv-6302-HDV-AJR |
| |) | |
| |) | |
| Plaintiff, |) | PLAINTIFF MARK SNOOKAL'S |
| |) | FIRST SET OF WRITTEN |
| |) | INTERROGATORIES TO |
| vs. |) | DEFENDANT CHEVRON USA. |
| |) | INC. |
| |) | |
| CHEVRON USA, INC., a California |) | [FRCP RULE 33] |
| Corporation, and DOES 1 through |) | |
| 10, inclusive, |) | |
| |) | |
| |) | |
| |) | |
| Defendants. |) | |
| |) | |
| |) | |

INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all individuals involved in the decision to declare Plaintiff “not fit for duty” for the Reliability Engineering Manager position in Escravos, Nigeria.

INTERROGATORY NO. 2:

IDENTIFY any and all persons who were involved in the hiring decisions for any of the job positions described in Paragraph 29 of the Complaint.

INTERROGATORY NO. 3:

For each person **YOU IDENTIFY** in response to Interrogatory No. 2 above, state their date of birth.

INTERROGATORY NO. 4:

For each job position to which Plaintiff applied (as identified in Paragraph 29 of the Complaint), describe in detail all of the hiring criteria **YOU** used to select each applicant for each position.

INTERROGATORY NO. 5:

For each job position to which Plaintiff applied (as described in Paragraph 29 of the Complaint) **IDENTIFY** each person **YOU** selected for that position.

INTERROGATORY NO. 6:

For each person **YOU IDENTIFY** in response to Interrogatory No. 5 above, state their date of birth.

INTERROGATORY NO. 7:

For each person identified in **YOUR** response to Interrogatory No. 5, describe in detail in what way(s) the person **YOU** selected was allegedly more qualified than Plaintiff.

INTERROGATORY NO. 8:

Describe in detail the reason **YOU** deemed Plaintiff “not fit for duty” for the Reliability Engineering Manager position in Escravos, Nigeria.

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On **May 7, 2024** I served the foregoing document described as **PLAINTIFF MARK SNOOKAL'S FIRST SET OF WRITTEN INTERROGATORIES TO DEFENDANT CHEVRON USA, INC** on interested parties in this action:

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[X] BY ELECTRONIC SERVICE: Pursuant to the Parties' agreement to accept service electronically, I caused such document to be electronically served via email to the email addresses of the addressee(s).

Executed on **May 7, 2024** at Los Angeles, California.

[X] Federal I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.


ANGIE O. PAZ